

M. JODI RELL
GOVERNOR

STATE OF CONNECTICUT

OFFICE OF HEALTH CARE ACCESS

CRISTINE A. VOGEL
COMMISSIONER

July 9, 2004

Ms. Susan Santoro
Director, Program and Business Development
Norwalk Hospital
34 Maple Street
Norwalk, CT 06856

RE: **Report Number 04-30334-DTR**; Certificate of Need Determination
Closure of the Westport Clinic in Westport

Dear Ms. Santoro:

It has come to the attention of the Office of Health Care Access ("OHCA") that Norwalk Hospital may have or may be intending to close The Westport Clinic in Westport. In a pending matter before OHCA under Docket Number 04-30310-WVR for Positive Directions, OHCA has learned that "**The Westport Clinic**, another local facility has provided outpatient mental health services for the same three decades and will close June 30." In addition, in a letter on the matter of Docket Number 04-30310-WVR, the Department of Mental Health and Addiction Services filed a letter that indicated "DMHAS reviewed a request from Positive Direction – The Center for Prevention & Recovery for a CON exemption to provide outpatient mental health services which were previously provided through a contract with **Norwalk Hospital**." From this it appears that Norwalk Hospital has or will be terminating a health care function or services, which may require Certificate of Need authorization pursuant to Section 19a-638(a)(3) of the Connecticut General Statutes. As such, OHCA requires the following information:

1. Does or did Norwalk Hospital provide health care services at The Westport Clinic in Westport? Fully describe the services provided at that location by Norwalk Hospital or any other affiliated entity.
2. Have the services at this location terminated in whole or in part? If so, identify the date of closure and the rationale for full or partial closure.
3. Is this a satellite location on Norwalk Hospital's acute care hospital license or does it have its own license? Provide a copy of the associated license.

An Equal Opportunity Employer

410 Capitol Avenue, MS #13HCA, P.O. Box 340308, Hartford, Connecticut 06134-0308

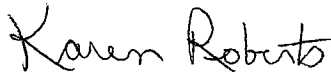
Telephone: (860) 418-7001 • Toll free (800) 797-9688

Fax: (860) 418-7053

4. Fully discuss the ownership and operational structure of The Westport Clinic.
5. Were services at this location billed for as Norwalk Hospital services and did utilization, revenues and expenses get booked on Norwalk Hospital's books?

Please provide a response to the above inquiry by July 30, 2004. If you have any questions regarding the above inquiry, please contact me at (860) 418-7001.

Sincerely,



Karen Roberts
Compliance Officer

Copy: Commissioner Cristine Vogel, OHCA

NORWALK HOSPITAL

RECEIVED

2004 JUL 28 PM 2:20

CONNECTICUT OFFICE OF
HEALTH CARE ACCESS

FACSIMILE TRANSMITTAL SHEET

TO:	FROM:
Comm. Cristine Vogel	Susan Santoro
COMPANY:	DATE:
OHCA	7.28.2004
FAX NUMBER:	TOTAL NO. OF PAGES INCLUDING COVER:
860-418-7053	11
PHONE NUMBER:	SENDER'S REFERENCE NUMBER:
RE:	YOUR REFERENCE NUMBER:
Report #: 04-30334-DTR	
Westport Clinic	

☐ URGENT ☐ FOR REVIEW ☐ PLEASE COMMENT ☐ PLEASE REPLY ☐ PLEASE RECYCLE

Notes/Comments:



Norwalk Hospital

Norwalk,
Connecticut 06856

July 28, 2004

Via Fax and Mail

Karen Roberts
Compliance Officer
Office Of Health Care Access
410 Capitol Avenue, MS 13HCA
Post Office Box 340308
Hartford, Connecticut 06134

RE: Report Number 04-30334-DTR; Certificate of Need Determination
Closure of the Westport Clinic in Westport

Dear Ms. Roberts:

Correspondence dated July 9, 2004 from the Office Of Health Care Access (Attachment 1) requested information concerning the services provided at The Westport Clinic. Norwalk Hospital has provided a response to these questions which are included as Attachment 2.

Should you require further information or should any further action be required, please contact me at 203.852.2025 or email address susan.santoro@norwalkhealth.org.

Sincerely,

Susan Santoro
Director, Program and Business Development

Copy: David W. Osborne
Paul Nurick
Frank Murphy, Esq.
Commissioner Cristine Vogel, OHCA

Attachment 1



M. JODI RELL
GOVERNOR

STATE OF CONNECTICUT
OFFICE OF HEALTH CARE ACCESS

CRISTINE A. VOGEL
COMMISSIONER

July 9, 2004

Ms. Susan Santoro
Director, Program and Business Development
Norwalk Hospital
34 Maple Street
Norwalk, CT 06856

RE: **Report Number 04-30334-DTR; Certificate of Need Determination**
Closure of the Westport Clinic in Westport

Dear Ms. Santoro:

It has come to the attention of the Office of Health Care Access ("OHCA") that Norwalk Hospital may have or may be intending to close The Westport Clinic in Westport. In a pending matter before OHCA under Docket Number 04-30310-WVR for Positive Directions, OHCA has learned that "**The Westport Clinic**, another local facility has provided outpatient mental health services for the same three decades and will close June 30." In addition, in a letter on the matter of Docket Number 04-30310-WVR, the Department of Mental Health and Addiction Services filed a letter that indicated "DMHAS reviewed a request from Positive Direction - The Center for Prevention & Recovery for a CON exemption to provide outpatient mental health services which were previously provided through a contract with **Norwalk Hospital**." From this it appears that Norwalk Hospital has or will be terminating a health care function or services, which may require Certificate of Need authorization pursuant to Section 19a-638(a)(3) of the Connecticut General Statutes. As such, OHCA requires the following information:

1. Does or did Norwalk Hospital provide health care services at The Westport Clinic in Westport? Fully describe the services provided at that location by Norwalk Hospital or any other affiliated entity.
2. Have the services at this location terminated in whole or in part? If so, identify the date of closure and the rationale for full or partial closure.
3. Is this a satellite location on Norwalk Hospital's acute care hospital license or does it have its own license? Provide a copy of the associated license.

An Equal Opportunity Employer

410 Capitol Avenue, MS #13HCA, P.O. Box 340308, Hartford, Connecticut 06134-0308

Telephone: (860) 418-7001 • Toll free (800) 797-9688

Fax: (860) 418-7053

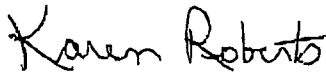
Susan Santoro, Director, Prog. & Bus. Dev.
Norwalk Hospital
Report No. 04-30334-DTR

July 9, 2004
Page 2

4. Fully discuss the ownership and operational structure of The Westport Clinic.
5. Were services at this location billed for as Norwalk Hospital services and did utilization, revenues and expenses get booked on Norwalk Hospital's books?

Please provide a response to the above inquiry by July 30, 2004. If you have any questions regarding the above inquiry, please contact me at (860) 418-7001.

Sincerely,



Karen Roberts
Compliance Officer

Copy: Commissioner Cristine Vogel, OHCA

Attachment 2

NORWALK HOSPITAL
REPORT NUMBER 04-30334-DTR
CERTIFICATE OF NEED DETERMINATION
CLOSURE OF WESTPORT CLINIC IN WESTPORT

1. Does or did Norwalk Hospital provide health care services at the Westport Clinic in Westport? Fully describe the services provided at the location by Norwalk Hospital or any affiliated entity.

Response: Yes, Norwalk Hospital has provided outpatient behavioral health services at The Westport Clinic located in Westport, Connecticut.

Nursing and Home Care, Incorporated, through its subsidiary, The Family Center Services, Incorporated, ("The Family Center") executed a services agreement with the Norwalk Hospital to serve as the behavioral health program provider at 1690 Post Road East in Westport, Connecticut. Under the direction of the Norwalk Hospital Department of Psychiatry, individual, family, and group counseling and medication management services were provided at The Family Center.

In 1999, The Family Center relocated to the present location at 319 Post Road East in the town of Westport, Connecticut. Subsequent to this relocation, the Nursing and Home Care, Incorporated encountered fiscal difficulties and could no longer provide community support and educational programs at this location. In 2001, Norwalk Hospital had assumed the lease for the 319 Post Road East location and re-named the site as "The Westport Clinic" to be operated under the Norwalk Hospital license. A copy of the Norwalk Hospital State Of Connecticut Department Of Public Health License with The Westport Clinic listing is included as Attachment 2A.

NORWALK HOSPITAL
REPORT NUMBER 04-30334-DTR
CERTIFICATE OF NEED DETERMINATION
CLOSURE OF WESTPORT CLINIC IN WESTPORT

2. Have the services at this location terminated in whole or in part? If so, identify the date of closure and rationale for full or partial closure.

Response: The services provided at The Westport Clinic site have been relocated to the Norwalk Hospital campus. The rationale for this change in site of service is a fully staffed program with under-performing clinical workload volumes could not support satellite services at the 319 Post Road East site. The patients being served at the 319 Post Road East location are now being served at the Norwalk Hospital campus. The change in site of service from 319 Post Road East in Westport, Connecticut to Norwalk Hospital located on Maple Street in Norwalk, Connecticut became effective July 6, 2004.

3. Is this a satellite location on Norwalk Hospital's acute care hospital license or does it have its own license? Provide a copy of the associated license.

Response: The Westport Clinic has been a satellite location of Norwalk Hospital and is so noted on the Norwalk Hospital General Hospital license as issued by the State Of Connecticut Department Of Public Health. The Norwalk Hospital license is included as Attachment 2A.

4. Fully discuss the ownership and operational structure of the Westport Clinic.

Response: The Westport Clinic has been operated as a licensed satellite program of the Norwalk Hospital until the relocation of the site of service to the Norwalk Hospital campus on July 6, 2004. The services provided at the 319 Post Road East location were the operational responsibility of the Department of Psychiatry. The day-to-day oversight of the clinical staff of the Westport Clinic was the responsibility of the departmental Clinical Coordinator, who reported jointly to the Chairman of the Department of Psychiatry and to departmental Administrative Director. The Administrative Director of the Department Of Psychiatry is a trained clinical professional holding a Ph.D. in public administration.

NORWALK HOSPITAL
REPORT NUMBER 04-30334-DTR
CERTIFICATE OF NEED DETERMINATION
CLOSURE OF WESTPORT CLINIC IN WESTPORT

5. Were services at this location billed for as Norwalk Hospital services and did utilization, revenues and expenses get booked on Norwalk Hospital's books

Response: Yes, The Westport Clinic, as a satellite clinic, billed services as Norwalk Hospital services. The utilization and associated revenues and expenses were expensed to the Norwalk Hospital books and records.

Attachment 2A

STATE OF CONNECTICUT
Department of Public Health
LICENSE
License No. 0053
General Hospital

In accordance with the provisions of the General Statutes of Connecticut Section 19a-493:

Norwalk Hospital Association of Norwalk, CT, d/b/a Norwalk Hospital is hereby licensed to maintain and operate a General Hospital.

Norwalk Hospital is located at Maple Street, Norwalk, CT 06856

The maximum number of beds shall not exceed at any time:

38 Bassinets
328 General Hospital beds

This license expires **June 30, 2005** and may be revoked for cause at any time.

Dated at Hartford, Connecticut, July 1, 2003. RENEWAL.

License revised to reflect:

7/22/03

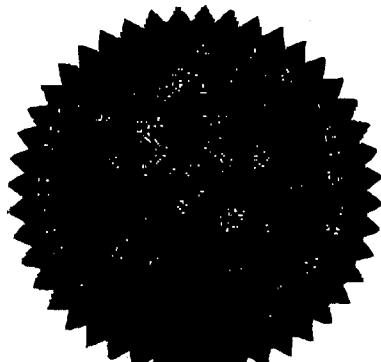
Name Change of Satellite (Westport Clinic)

Deleted Satellite (Springwood Health Clinic)

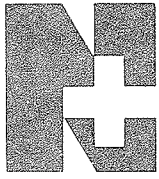
Satellites

The Westport Clinic, 319 Post Road East, Westport, CT

South Norwalk Behavioral Health Center, 149 Water Street, 2nd Floor, South Norwalk, CT



Norma Gyle, R.N., Ph.D., Acting
Commissioner



RECEIVED

2004 JUL 30 AM 11:33

Norwalk Hospital

Norwalk,
Connecticut 06856

CONNECTICUT OFFICE OF
HEALTH CARE ACCESS

July 28, 2004

Via Fax and Mail

Karen Roberts
Compliance Officer
Office Of Health Care Access
410 Capitol Avenue, MS 13HCA
Post Office Box 340308
Hartford, Connecticut 06134

RE: **Report Number 04-30334-DTR**; Certificate of Need Determination
Closure of the Westport Clinic in Westport

Dear Ms. Roberts:

Correspondence dated July 9, 2004 from the Office Of Health Care Access (Attachment 1) requested information concerning the services provided at The Westport Clinic. Norwalk Hospital has provided a response to these questions which are included as Attachment 2.

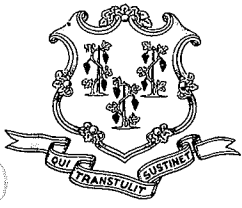
Should you require further information or should any further action be required, please contact me at 203.852.2025 or email address susan.santoro@norwalkhealth.org.

Sincerely,

Susan Santoro
Director, Program and Business Development

Copy: David W. Osborne
Paul Nurick
Frank Murphy, Esq.
Commissioner Cristine Vogel, OHCA

Attachment 1



STATE OF CONNECTICUT

OFFICE OF HEALTH CARE ACCESS

M. JODI RELL
GOVERNOR

CRISTINE A. VOGEL
COMMISSIONER

July 9, 2004

Ms. Susan Santoro
Director, Program and Business Development
Norwalk Hospital
34 Maple Street
Norwalk, CT 06856

RE: **Report Number 04-30334-DTR**; Certificate of Need Determination
Closure of the Westport Clinic in Westport

Dear Ms. Santoro:

It has come to the attention of the Office of Health Care Access ("OHCA") that Norwalk Hospital may have or may be intending to close The Westport Clinic in Westport. In a pending matter before OHCA under Docket Number 04-30310-WVR for Positive Directions, OHCA has learned that "**The Westport Clinic**, another local facility has provided outpatient mental health services for the same three decades and will close June 30." In addition, in a letter on the matter of Docket Number 04-30310-WVR, the Department of Mental Health and Addiction Services filed a letter that indicated "DMHAS reviewed a request from Positive Direction – The Center for Prevention & Recovery for a CON exemption to provide outpatient mental health services which were previously provided through a contract with **Norwalk Hospital**." From this it appears that Norwalk Hospital has or will be terminating a health care function or services, which may require Certificate of Need authorization pursuant to Section 19a-638(a)(3) of the Connecticut General Statutes. As such, OHCA requires the following information:

1. Does or did Norwalk Hospital provide health care services at The Westport Clinic in Westport? Fully describe the services provided at that location by Norwalk Hospital or any other affiliated entity.
2. Have the services at this location terminated in whole or in part? If so, identify the date of closure and the rationale for full or partial closure.
3. Is this a satellite location on Norwalk Hospital's acute care hospital license or does it have its own license? Provide a copy of the associated license.

An Equal Opportunity Employer

410 Capitol Avenue, MS #13HCA, P.O. Box 340308, Hartford, Connecticut 06134-0308

Telephone: (860) 418-7001 • Toll free (800) 797-9688

Fax: (860) 418-7053

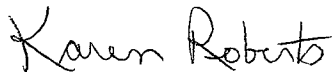
Susan Santoro, Director, Prog. & Bus. Dev.
Norwalk Hospital
Report No. 04-30334-DTR

July 9, 2004
Page 2

4. Fully discuss the ownership and operational structure of The Westport Clinic.
5. Were services at this location billed for as Norwalk Hospital services and did utilization, revenues and expenses get booked on Norwalk Hospital's books?

Please provide a response to the above inquiry by July 30, 2004. If you have any questions regarding the above inquiry, please contact me at (860) 418-7001.

Sincerely,



Karen Roberts
Compliance Officer

Copy: Commissioner Cristine Vogel, OHCA

Attachment 2

1. Does or did Norwalk Hospital provide health care services at the Westport Clinic in Westport? Fully describe the services provided at the location by Norwalk Hospital or any affiliated entity.

Response: Yes, Norwalk Hospital has provided outpatient behavioral health services at The Westport Clinic located in Westport, Connecticut.

Nursing and Home Care, Incorporated, through its subsidiary, The Family Center Services, Incorporated, ("The Family Center") executed a services agreement with the Norwalk Hospital to serve as the behavioral health program provider at 1690 Post Road East in Westport, Connecticut. Under the direction of the Norwalk Hospital Department of Psychiatry, individual, family, and group counseling and medication management services were provided at The Family Center.

In 1999, The Family Center relocated to the present location at 319 Post Road East in the town of Westport, Connecticut. Subsequent to this relocation, the Nursing and Home Care, Incorporated encountered fiscal difficulties and could no longer provide community support and educational programs at this location. In 2001, Norwalk Hospital had assumed the lease for the 319 Post Road East location and re-named the site as "The Westport Clinic" to be operated under the Norwalk Hospital license. A copy of the Norwalk Hospital State Of Connecticut Department Of Public Health License with The Westport Clinic listing is included as Attachment 2A.

2. Have the services at this location terminated in whole or in part? If so, identify the date of closure and rationale for full or partial closure.

Response: The services provided at The Westport Clinic site have been relocated to the Norwalk Hospital campus. The rationale for this change in site of service is a fully staffed program with under-performing clinical workload volumes could not support satellite services at the 319 Post Road East site. The patients being served at the 319 Post Road East location are now being served at the Norwalk Hospital campus. The change in site of service from 319 Post Road East in Westport, Connecticut to Norwalk Hospital located on Maple Street in Norwalk, Connecticut became effective July 6, 2004.

3. Is this a satellite location on Norwalk Hospital's acute care hospital license or does it have its own license? Provide a copy of the associated license.

Response: The Westport Clinic has been a satellite location of Norwalk Hospital and is so noted on the Norwalk Hospital General Hospital license as issued by the State Of Connecticut Department Of Public Health. The Norwalk Hospital license is included as Attachment 2A.

4. Fully discuss the ownership and operational structure of the Westport Clinic.

Response: The Westport Clinic has been operated as a licensed satellite program of the Norwalk Hospital until the relocation of the site of service to the Norwalk Hospital campus on July 6, 2004. The services provided at the 319 Post Road East location were the operational responsibility of the Department of Psychiatry. The day-to-day oversight of the clinical staff of the Westport Clinic was the responsibility of the departmental Clinical Coordinator, who reported jointly to the Chairman of the Department of Psychiatry and to departmental Administrative Director. The Administrative Director of the Department Of Psychiatry is a trained clinical professional holding a Ph.D. in public administration.

NORWALK HOSPITAL
REPORT NUMBER 04-30334-DTR
CERTIFICATE OF NEED DETERMINATION
CLOSURE OF WESTPORT CLINIC IN WESTPORT

5. Were services at this location billed for as Norwalk Hospital services and did utilization, revenues and expenses get booked on Norwalk Hospital's books

Response: Yes, The Westport Clinic, as a satellite clinic, billed services as Norwalk Hospital services. The utilization and associated revenues and expenses were expensed to the Norwalk Hospital books and records.

Attachment 2A

STATE OF CONNECTICUT
Department of Public Health

LICENSE

License No. 0053

General Hospital

In accordance with the provisions of the General Statutes of Connecticut Section 19a-493:

Norwalk Hospital Association of Norwalk, CT, d/b/a Norwalk Hospital is hereby licensed to maintain and operate a General Hospital.

Norwalk Hospital is located at Maple Street, Norwalk, CT 06856

The maximum number of beds shall not exceed at any time:

38 Bassinets

328 General Hospital beds

This license expires **June 30, 2005** and may be revoked for cause at any time.

Dated at Hartford, Connecticut, July 1, 2003. RENEWAL.

License revised to reflect:

7/22/03

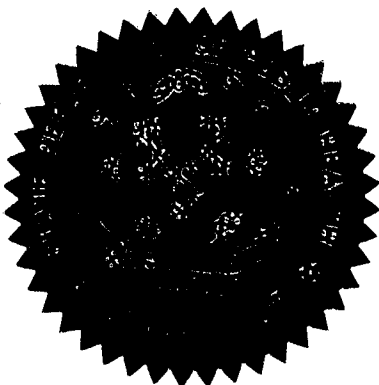
Name Change of Satellite (Westport Clinic)

Deleted Satellite (Springwood Health Clinic)

Satellites

The Westport Clinic, 319 Post Road East, Westport, CT

South Norwalk Behavioral Health Center, 149 Water Street, 2nd Floor, South Norwalk, CT



A handwritten signature in black ink, appearing to read "Norma Gyle", is written over a horizontal line.

Norma Gyle, R.N., Ph.D., Acting
Commissioner



STATE OF CONNECTICUT
OFFICE OF HEALTH CARE ACCESS

M. JODI RELL
GOVERNOR

CRISTINE A. VOGEL
COMMISSIONER

August 3, 2004

Ms. Susan Santoro, Director
Program and Business Development
Norwalk Hospital
34 Maple Street
Norwalk, CT 06856

Re: Certificate of Need Determination; Report Number 04-30334-DTR
Termination of Services at Westport Clinic in Westport Connecticut

Dear Ms. Santoro:

On July 9, 2004, the Office of Health Care Access ("OHCA") initiated a Certificate of Need ("CON") Determination process under Docket Number 04-30334-DTR to determine whether Norwalk Hospital ("Hospital") terminated a health care service offered in Westport. On July 30, 2004, OHCA received the Hospital's response to OHCA's CON Determination inquiry. OHCA staff has reviewed these responses and makes the following pertinent findings in this matter:

1. Norwalk Hospital (the "Hospital") is an acute care general hospital and a health care facility or institution as defined in Section 19a-630 of the Connecticut General Statutes. The Hospital's main campus is located at 34 Maple Street in Norwalk Connecticut.
2. Nursing and Home Care, Inc., through its subsidiary, The Family Center Services, Inc. ("The Family Center"), had executed a services agreement with the Hospital to serve as the behavioral health program provider at 1690 Post Road in Westport. Under the direction of the Hospital's Department of Psychiatry, individual, family and group counseling and medication management services were provided at The Family Center.
3. In 1999, The Family Center relocated to 319 Post Road East in Westport. The Nursing and Home Care, Incorporated subsequently encountered fiscal difficulties and could no longer provide community support and educational programs at this location.
4. In 2001, the Hospital assumed the lease for the 319 Post Road East location and re-named the site "The Westport Clinic" to be operated under the Norwalk Hospital license. This site is listed as a satellite location of the Hospital on the Hospital's General Hospital license.

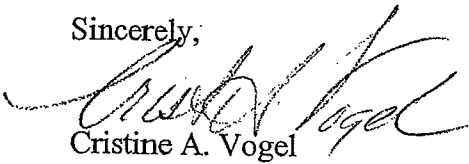
An Equal Opportunity Employer
410 Capitol Ave., MS#13HCA, P.O. Box 340308, Hartford, CT 06134-0308
Telephone: (860) 418-7001 Toll-Free: 1-800-797-9688
Fax: (860) 418-7053

5. The services at The Westport Clinic were billed for as Norwalk Hospital services and the utilization and associated revenues and expenses were expensed to the Norwalk Hospital books and records.
6. The Hospital states that the services provided at The Westport Clinic site have been relocated to the Norwalk Hospital campus. Patient which had been served at the 319 Post Road East location are now being served at the Norwalk Hospital Campus. The rationale for this change in site of service is the The Westport Clinic was a full staff program with under-performing clinical workload volumes.
7. Norwalk Hospital is no longer providing satellite behavioral health services at the 319 Post Road East location effective July 6, 2004.

Based on the above, OHCA has determined that Certificate of Need approval is required pursuant to Section 19a-638 of the Connecticut General Statutes, as amended by Public Act 03-17, in order for Norwalk Hospital to terminate the operation of The Westport Clinic, at 319 Post Road East in Westport, a satellite behavioral health service location.

OHCA considers the submission of information received on July 30, 2004 as the complete Letter of Intent for this matter; therefore the Hospital may file a CON application with OHCA between September 28, 2004 and November 27, 2004. The CON application is being mailed to your attention separately. If you have any questions regarding the above, please contact Karen Roberts, OHCA Compliance Officer at (860) 418-7041.

Sincerely,



Cristine A. Vogel
Commissioner

CAV: kr

cc: Rose McLellan, Licensing Examination Assistant, DHSR, DPH